

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

MENDI YOSHIKAWA, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

EXXON MOBIL CORPORATION, DARREN  
W. WOODS, ANDREW P. SWIGER, and  
DAVID S. ROSENTHAL,

Defendants.

MARTIN J. BENTLER, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

EXXON MOBIL CORPORATION, DARREN  
W. WOODS, ANDREW P. SWIGER, DAVID  
S. ROSENTHAL, NEIL A. CHAPMAN,  
JACK P. WILLIAMS, LIAM M. MALLON,  
NEIL A. HANSEN, and JEFFREY J.  
WOODBURY,

Defendants.

§ CIVIL ACTION NO. 3:21-cv-00194-N

§  
§ **NOTICE OF MOTION AND MOTION OF**  
§ **MARK LLANO TO CONSOLIDATE**  
§ **RELATED ACTIONS, FOR**  
§ **APPOINTMENT AS LEAD PLAINTIFF**  
§ **AND APPROVAL OF LEAD PLAINTIFF'S**  
§ **SELECTION OF COUNSEL**

§ CLASS ACTION

§ CIVIL ACTION NO. 3:21-cv-00335-X

§ CLASS ACTION

Movant Mark Llano ("Movant"), through counsel, hereby moves the Court pursuant to Section 21D of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), for an order:

- (a) consolidating the related actions;

- (b) appointing Movant as Lead Plaintiff on behalf of all persons other than defendants who purchased or otherwise acquired Exxon Mobil Corporation securities between February 28, 2019 and January 14, 2021, inclusive (the “Class”); and
- (c) approving Movant’s selection of The Rosen Law Firm, P.A. as Lead Counsel for the Class and Steckler Wayne Cochran Cherry, PLLC as Liaison Counsel for the Class.

In support of this Motion, Movant submits: (1) a Memorandum of Law dated March 29, 2021; (2) an Appendix Accompanying Movant’s Motion, dated March 29, 2021; and (3) a [Proposed] Order Consolidating the Related Actions, Appointing Movant as Lead Plaintiff and Approving Movant’s Selection of Counsel.

#### **CERTIFICATE OF CONFERENCE**

Local Rule 7.1(a) requires a conference of counsel prior to filing motions. Due to the PSLRA’s lead plaintiff procedure, however, Movant does not yet know which other entities or persons plan to move for appointment as lead plaintiff until after all the movants have filed their respective motions. Under these circumstances, Movant respectfully requests that the conferral requirement of Local Rule 7.1(a) be waived.

Dated: March 29, 2021

Respectfully submitted,

**STECKLER WAYNE COCHRAN CHERRY,  
PLLC**

/s/ Stuart L. Cochran

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[Proposed] Liaison Counsel for Plaintiff and Class

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[Proposed] Lead Counsel for Plaintiff and Class

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of March 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Stuart L. Cochran  
Stuart L. Cochran